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5 Attorneys for Defendant
6 Aviation Services (CNMI), Ltd. dba Freedom Air

FILED

Clerk

District Court

MAR 15 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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8
9 UNITED STATES DISTRICT COURT

10 FOR THE

11 NORTHERN MARIANA ISLANDS

12 MOSES T. FEJERAN and
13 QIANYAN S. FEJERAN,

CIVIL ACTION NO. 05-0033

Plaintiffs,

14 vs.
15 DEFENDANT'S INITIAL
16 DISCLOSURES; CERTIFICATE
17 OF SERVICE

AVIATION SERVICES (CNMI), LTD.
16 dba FREEDOM AIR,

17 Defendant.

18 Defendant Aviation Services (CNMI), Ltd. dba Freedom Air, by and through their
19 Attorney of record, David Ledger, submit the following disclosure statement pursuant to Fed. R.
20 Civ. P. 26(a)(1) and LR 16.2CJ(d):

22 I. Persons likely to have Discoverable Information

- 23 1. Felicidad (Doll) Boddy
24 Freedom Air
c/o Carlsmith Ball LLP
25 Carlsmith Ball LLP Building
Capitol Hill
Post Office Box 5241
26 Saipan, MO 96950-5241
27 Tel No. 670.322.3455

1 2. Francisco Muna
2 Freedom Air
3 c/o Carlsmith Ball LLP
4 Carlsmith Ball LLP Building
5 Capitol Hill
6 Post Office Box 5241
7 Saipan, MO 96950-5241
8 Tel No. 670.322.3455

9 6 3. Inas Suzuke
10 7 Freedom Air
11 8 c/o Carlsmith Ball LLP
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16 13 Tel No. 670.322.3455

17 II. Listing, Description and Location of Documents, Data Compilations and Tangible
18 Things

- 19 1. 8/22/05 Incident Report written by Francisco Muna. (000004)
20 2. 1/18/05 Incident Reports written by Felicidad Boddy. (000001-000002)
21 3. Notes regarding Moses Fejeren written by Inas Suzuke. (000003)
22 4. Transcription of Incident Reports. (000005)
23 5. Various photographs of aircraft and offloading steps. (000006-000011)

24 III. Description and Computation of Damages

25 Not applicable.

26 IV. Insurance Agreements

27 The insurance agreement is available for inspection and copying upon request.

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1 V. Expert Testimony

2 Defendant has not retained an expert at this time.

3 DATED: Hagåtña, Guam, March 13, 2006.

4 CARLSMITH BALL LLP



5 DAVID LEDGER
6 Attorneys for Defendant
7 Aviation Services (CNMI), Ltd.
8 dba Freedom Air

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of March 2006, I will cause to be served, via hand delivery, a true and correct copy of DEFENDANT'S INITIAL DISCLOSURES to the following Counsel of record.

David G. Banes, Esq.
O'Connor Berman Dotts & Banes
Second Floor, Nauru Building
Post Office Box 501969
Saipan, MP 96950

DATED: Hagåtña, Guam, March 13, 2006.

DAVID LEDGER